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6 *Attorneys for Defendant Everest National Insurance Company*

7 **UNITED STATES DISTRICT COURT**  
8 **DISTRICT OF NEVADA**

9 BEDROC LIMITED, LLC, a Nevada limited  
liability company,

10 Plaintiff,

11 vs.

12 EVEREST NATIONAL INSURANCE  
COMPANY, a Delaware corporation,

13 Defendant.

14 Case No. 2:22-cv-01470-RFB-DJA

15 **STIPULATION AND ORDER TO  
EXTEND TIME TO RESPOND TO  
COMPLAINT**

16 **(FIRST REQUEST)**

17 The Parties jointly stipulate that Defendant Everest National Insurance Company's time to  
18 respond to Plaintiff's Complaint is extended until **Monday, October 17, 2022**. This is the first  
19 extension of time of Defendant's deadline to respond to the Complaint. The extension is a brief  
20 extension requested to accommodate defense counsel being recently retained and scheduling  
21 conflicts. The current deadline is October 7, 2022, and the requested extension is for ten (10)  
22 additional days.

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The Parties hereto preserve and do not waive any objections or defenses by this Stipulation.

1 **IT IS SO STIPULATED, this 6th day of October, 2022.**

2 /s/ *Howard J. Russell*

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4 Howard J. Russell, Esq.  
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/s/ *F. Thomas Edwards*

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Attorneys for Plaintiff

7 IT IS SO ORDERED:  
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10 DANIEL J. ALBREGTS  
11 UNITED STATES MAGISTRATE JUDGE

12 DATED: October 7, 2022

13 WEINBERG WHEELER  
14 HUDGINS GUNN & DIAL  
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